

**Supporting Statement for Paperwork Reduction Act Submission
OMB Control Number 1018-0010**

**Mourning Dove Call Count Survey
FWS Form 3-159
October 5, 2005**

A. Justification

1. Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection. Attach a copy of the appropriate section of each statute and regulation mandating or authorizing the collection of information.

The Migratory Bird Treaty Act of July 3, 1918 (40 stat. 755; 16 U.S.C. 703-711), as amended, authorizes and directs the Secretary of the Interior to determine to what extent migratory game birds may be hunted. The Secretary has delegated this authority to the Fish and Wildlife Service (Division of Migratory Bird Management). For several species of game birds, including the mourning dove, we base this determination primarily on biological information gathered through surveys. For mourning doves, an important migratory game bird, we collect the essential information by means of the call count survey.

2. Indicate how, by whom, and for what purpose the information is to be used. Except for a new collection, indicate the actual use the agency has made of the information received from the current collection. [Be specific. If this collection is a form or a questionnaire, every question needs to be justified.]

This survey is a cooperative effort between State wildlife agencies and the Fish and Wildlife Service. State, tribal, local, and Federal biologists conduct the survey each spring, using FWS Form 3-159 (Mourning Dove Call-Count Survey) to report survey data to the Division of Migratory Bird Management (DMBM). Instructions for completing the survey and reporting data are on the reverse of the form. We use observer information (name, telephone, and mailing address) to contact the observer if questions or concerns arise. All other information is used to aid in processing the survey form. We analyze the survey data and prepare reports. The resulting assessment of the population's status serves to guide both the Service and the States in the annual promulgation of regulations for hunting mourning doves. We also use survey data to plan and evaluate dove management programs and provide specific information necessary for dove research. If this survey were not conducted, we would have no way to determine the population status of mourning doves prior to setting regulations.

3. Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological collection techniques or other forms of information technology, e.g., permitting electronic submission of responses, and

the basis for the decision for adopting this means of collection. Also describe any consideration of using information technology to reduce burden [and specifically how this collection meets GPEA requirements].

The burden is minimal, and we do not believe the procedures can be simplified. General information, such as survey year, route number and location, region, and sunrise time are printed on the forms before they are distributed to cooperators. The reporting procedure requires that the respondent use pen or pencil to fill out FWS Form 3-159. The respondent can voluntarily submit data electronically to further assist DMBM personnel with keypunching.

4. Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purposes described in Item 2 above.

Within the Federal Government, DMBM is the sole organizational unit charged with monitoring the population status of mourning doves. As stated in paragraph 2, this survey is a cooperative effort with State wildlife agencies. State and Service personnel review the survey results at annual technical committee meetings. The information that we obtain through the survey is not available from another source either within or outside of the Fish and Wildlife Service.

5. If the collection of information impacts small businesses or other small entities (Item 5 of OMB Form 83-I), describe any methods used to minimize burden.

This survey does not impact small businesses or other small entities.

6. Describe the consequence to Federal program or policy activities if the collection is not conducted or is conducted less frequently, as well as any technical or legal obstacles to reducing burden.

Mourning dove populations are dynamic and, as a result, change in size and status from year to year. For this reason, the promulgation of hunting regulations has traditionally been an annual activity and, thus, annual assessments of the population status of the more important species, including mourning doves, are desirable. Without information on the population's status, we might promulgate hunting regulations that are not sufficiently restrictive, which could cause harm to the dove population, or too restrictive, which would unduly restrict recreational opportunities afforded by dove hunting. Another consequence is that the Service could be vulnerable to litigation charging mismanagement and failure to fulfill treaty and other obligations.

7. Explain any special circumstances that would cause an information collection to be conducted in a manner:

- * requiring respondents to report information to the agency more often than quarterly;
- * requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;

- * requiring respondents to submit more than an original and two copies of any document;
- * requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records, for more than three years;
- * in connection with a statistical survey, that is not designed to produce valid and reliable results that can be generalized to the universe of study;
- * requiring the use of a statistical data classification that has not been reviewed and approved by OMB;
- * that includes a pledge of confidentiality that is not supported by authority established in statute or regulation, that is not supported by disclosure and data security policies that are consistent with the pledge, or which unnecessarily impedes sharing of data with other agencies for compatible confidential use; or
- * requiring respondents to submit proprietary trade secrets, or other confidential information unless the agency can demonstrate that it has instituted procedures to protect the information's confidentiality to the extent permitted by law.

No special circumstances exist that would require this collection to be conducted in a manner inconsistent with OMB guidelines.

8. If applicable, provide a copy and identify the date and page number of publication in the Federal Register of the agency's notice, required by 5 CFR 1320.8(d), soliciting comments on the information collection prior to submission to OMB. Summarize public comments received in response to that notice [and in response to the PRA statement associated with the collection over the past three years] and describe actions taken by the agency in response to these comments. Specifically address comments received on cost and hour burden.

Describe efforts to consult with persons outside the agency to obtain their views on the availability of data, frequency of collection, the clarity of instructions and recordkeeping, disclosure, or reporting format (if any), and on the data elements to be recorded, disclosed, or reported. [Please list the names, titles, addresses, and phone numbers of persons contacted.]

Consultation with representatives of those from whom information is to be obtained or those who must compile records should occur at least once every 3 years — even if the collection of information activity is the same as in prior periods. There may be circumstances that may preclude consultation in a specific situation. These circumstances should be explained.

On May 12, 2005, we published in the Federal Register (70 FR 25108) a notice of our intent to request that OMB renew authority for this information collection. In that notice, we solicited public comments for 60 days, ending July 11, 2005. We received no comments during that period.

A Service representative meets with representatives from States within each unit annually to discuss survey procedures and results. A list of State representatives is below. Individual cooperators also have the opportunity to express concerns directly by including notes or letters with FWS Form 3-159.

Eastern Management Unit

1. David Scott, Wildlife Research Administrator, ODNR, Division of Wildlife, 2045 Morse Road, Bldg. G., Columbus, Ohio 43229-6693. <dave.scott@dnr.state.oh.us>
2. Billy Dukes, SCDNR, P.O. Box 167, Columbia, SC 29202. <DukesB@dnr.sc.gov>
3. Rocky Pritchert, KDFWR, No.1 Game Farm Rd., Frankfort, KY 40601
Rocky.Pritchert@mail.state.ky.us>
4. Mike Olinde, Louisiana DW&F. PO Box 98000 Baton Rouge, LA 70898.
molinde@wlf.louisiana.gov. 225-765-2355.

Central Management Unit

1. Helen Hands, Migratory Shore and Upland Game Bird Biologist, Cheyenne Bottoms Wildlife Area, 56 NE 40 Road, Great Bend, KS 67530. <helenh@wp.state.ks.us>
2. Jim Hansen, Central Flyway Migratory Bird Coordinator, MT Fish, Wildlife and Parks, 2300 Lake Elmo Drive, Billings, MT 59105. <jihansen@mt.gov>
3. Mike O'Meilia, Migratory Bird Biologist, OK Dept. of Wildlife Conservation, PO Box 53465, Oklahoma City, OK 73152. <momeilia@zoo.odwc.state.ok.us>
4. Scott Taylor, NE Game and Parks Commission, 2200 North 33rd Street, Lincoln, NE 68503-1417. <staylor@ngpc.state.ne.us>

Western Management Unit

1. Pat Lauridson, Wildlife Biologist, CA Dept. Fish and Game, 1812 Ninth Street, Suite 300, Sacramento, CA 95814. <plauridson@dfg.ca.gov>
2. Mike Rabe, Small Game Biologist, AZ Game and Fish Department, 2221 W. Greenway Road, Phoenix, AZ 85023-4399. <mrabe@gf.state.az.us>
3. Don Kraege, Waterfowl Program Manager, WA Dept. of Fish and Wildlife, 600 Capitol Way North, Olympia, WA 98501-1091. <kraegdck@dfw.wa.gov>

9. Explain any decision to provide any payment or gift to respondents, other than remuneration of contractors or grantees.

We do not provide payments or gifts to respondents.

10. Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or agency policy.

The only personal information that we obtain from respondents is their name, address, and telephone number. Our compliance with the Privacy Act ensures confidentiality of the information.

11. Provide additional justification for any questions of a sensitive nature, such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private. This justification should include the reasons why the agency considers the questions necessary, the specific uses to be made of the information, the explanation to be given to persons from whom the information is requested, and any steps to be taken to obtain their consent.

We do not ask any sensitive questions.

12. Provide estimates of the hour burden of the collection of information. The statement should:

- * Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated. Unless directed to do so, agencies should not conduct special surveys to obtain information on which to base hour burden estimates. Consultation with a sample (fewer than 10) of potential respondents is desirable. If the hour burden on respondents is expected to vary widely because of differences in activity, size, or complexity, show the range of estimated hour burden, and explain the reasons for the variance. Generally, estimates should not include burden hours for customary and usual business practices.**
- * If this request for approval covers more than one form, provide separate hour burden estimates for each form and aggregate the hour burdens in Item 13 of OMB Form 83-I.**
- * Provide estimates of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories. The cost of contracting out or paying outside parties for information collection activities should not be included here. Instead, this cost should be included in Item 14.**

There are approximately 1,062 annual responses. For each response, it will take cooperatives an average of 150 minutes to supply the needed information. This includes the time for reviewing instructions (15 minutes), gathering data during survey stops (120 minutes), and completing and reviewing the survey form (15 minutes). We estimate 80% of cooperators will voluntarily choose to submit data electronically, which adds an additional (10 minutes) for a total of 160 minutes. The total estimated burden is 167,796 minutes or 2,796.6 hours $[(1062 \times 0.80)160 + (1062 \times 0.20)150]$. The total dollar value of hours is estimated at \$58,728.60.

Without electronic submission (20% of cooperators)

Reviewing instructions	15 min
Gathering data	120 min
completing and reviewing form	<u>15 min</u>
Individual	150 min

# of cooperators	(1,062 x 0.20)
	x <u>150</u>
Total hrs (20%)	31,860 min/60 min = 531 hrs

With electronic submission (80% of cooperators)

Reviewing instructions	15 min
Gathering data	120 min
Completing & Reviewing form	15 min
Electronic submission	<u>10 min</u>
Individual	160 min
# of cooperators	(1,062 x 0.80)
	x <u>160</u>
Total hrs (80%)	135,936 min/60 min = 2,265.6 hrs
Total hrs	(531 + 2,265.6) = 2,796.6
Total \$ value of hours	(2,796.6 x \$21.00) = \$58,728.60

13. Provide an estimate of the total annual [non-hour] cost burden to respondents or recordkeepers resulting from the collection of information. (Do not include the cost of any hour burden shown in Items 12 and 14).

- * The cost estimate should be split into two components: (a) a total capital and start-up cost component (annualized over its expected useful life) and (b) a total operation and maintenance and purchase of services component. The estimates should take into account costs associated with generating, maintaining, and disclosing or providing the information [including filing fees paid]. Include descriptions of methods used to estimate major cost factors including system and technology acquisition, expected useful life of capital equipment, the discount rate(s), and the time period over which costs will be incurred. Capital and start-up costs include, among other items, preparations for collecting information such as purchasing computers and software; monitoring, sampling, drilling and testing equipment; and record storage facilities.

- * If cost estimates are expected to vary widely, agencies should present ranges of cost burdens and explain the reasons for the variance. The cost of purchasing or contracting out information collection services should be a part of this cost burden estimate. In developing cost burden estimates, agencies may consult with a sample of respondents (fewer than 10), utilize the 60-day pre-OMB submission public comment process and use existing economic or regulatory impact analysis associated with the rulemaking containing the information collection, as appropriate.
- * Generally, estimates should not include purchases of equipment or services, or portions thereof, made: (1) prior to October 1, 1995, (2) to achieve regulatory compliance with requirements not associated with the information collection, (3) for reasons other than to provide information or keep records for the government, or (4) as part of customary and usual business or private practices.

There are no nonhour dollar costs or burdens to the public.

- 14. Provide estimates of annualized cost to the Federal government. Also, provide a description of the method used to estimate cost, which should include quantification of hours, operational expenses (such as equipment, overhead, printing, and support staff), and any other expense that would not have been incurred without this collection of information. Agencies also may aggregate cost estimates from Items 12, 13, and 14 in a single table.**

Materials and forms	\$700
Postage	\$450
Salaries	\$13,300
Total	\$14,450

- 15. Explain the reasons for any program changes or adjustments reported in Items 13 or 14 of the OMB Form 83-I.**

The percentage of cooperators using electronic submission has increased by 30 percent over the past 3 years, thus increasing the total burden hours by 98.6.

- 16. For collections of information whose results will be published, outline plans for tabulation and publication. Address any complex analytical techniques that will be used. Provide the time schedule for the entire project, including beginning and ending dates of the collection of information, completion of report, publication dates, and other actions.**

Analytical techniques can be obtained from the annual Mourning Dove Breeding Population Status Report under METHODS.

Form 3-159 sent to cooperators	Early spring
Survey	May 20-31
Collection of forms	late May, early June
Data analysis	early June
Report writing	early June
Publication date	mid June
Service Regulations Committee Meeting (recommendations on hunting season)	late June

17. If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons that display would be inappropriate.

We will display the OMB control number and expiration date.

18. Explain each exception to the certification statement identified in Item 19, "Certification for Paperwork Reduction Act Submissions," of OMB Form 83-I.

There are no exceptions to the certification statement.

B. Collections of Information Employing Statistical Methods

- 1. Describe (including a numerical estimate) the potential respondent universe and any sampling or other respondent selection method to be used. Data on the number of entities (e.g., establishments, State and local government units, households, or persons) in the universe covered by the collection and in the corresponding sample are to be provided in tabular form for the universe as a whole and for each of the strata in the proposed sample. Indicate expected response rates for the collection as a whole. If the collection had been conducted previously, include the actual response rate achieved during the last collection.**

The respondent universe is all States in the United States (excluding Alaska and Hawaii). Random samples of routes within physiographic regions were selected such that each route represents roughly 750 mi² of land area. The response rate is approximately 95 percent because some circumstances prevent all requested routes from being run each year.

- 2. Describe the procedures for the collection of information including:**
 - * Statistical methodology for stratification and sample selection,**
 - * Estimation procedure,**
 - * Degree of accuracy needed for the purpose described in the justification,**
 - * Unusual problems requiring specialized sampling procedures, and**

- * Any use of periodic (less frequent than annual) data collection cycles to reduce burden.**

See the attached status report, Dolton, D.D., and R.D. Rau. 2005. Mourning dove population status, 2005. U.S. Fish and Wildlife Service, Laurel, Maryland. Pgs. 2-4., Baskett, T.S. 1993. Biological evaluation of the call-count survey. Pages 253-268 in T.S. Baskett, M.W. Sayre, R.E. Tomlinson, and R.E. Mirachi, eds., Ecology and management of the mourning dove. Stackpole Books. Harrisburg, PA. and Dolton, D.D. 1993. The call-count survey: Historic development and current procedures. Pages 233-252 in T.S. Baskett, M.W. Sayre, R.E. Tomlinson, and R.E. Mirachi, eds., Ecology and management of the mourning dove. Stackpole Books. Harrisburg, PA. for descriptions of statistical methods.

- 3. Describe methods to maximize response rates and to deal with issues of non-response. The accuracy and reliability of information collected must be shown to be adequate for intended uses. For collections based on sampling, a special justification must be provided for any collection that will not yield "reliable" data that can be generalized to the universe studied.**

We use phone contacts and a system of State coordinators to maximize timely response.

- 4. Describe any tests of procedures or methods to be undertaken. Testing is encouraged as an effective means of refining collections of information to minimize burden and improve utility. Tests must be approved if they call for answers to identical questions from 10 or more respondents. A proposed test or set of tests may be submitted for approval separately or in combination with the main collection of information.**

We have improved and refined the Call Count Survey methodology over the last 40 years. Future improvements and modifications are likely to be minor, as improvements have reached the point of diminishing returns.

- 5. Provide the name and telephone number of individuals consulted on statistical aspects of the design and the name of the agency unit, contractor(s), grantee(s), or other person(s) who will actually collect and/or analyze the information for the agency.**

Statistical consultants:

John Sauer	301-497-5662
Bill Kendall	301-497-5868

Persons collecting and analyzing data:

Rebecca Rau	301-497-5862
Bill Kendall	301-497-5868